

**Consolidated Environmental Comments on B&V RETI phase 1a Report**  
Compiled from comments received by NRDC and Sierra Club and including comments of  
NRDC and Sierra Club

April 4, 2008

**Overview:**

17 environmental groups including NRDC and Sierra Club, or individual environmentalists, took the time to comment on the Black and Veatch phase 1a draft report for RETI. Of these, a large majority supports the goal of RETI – i.e., to “identify those (*renewable energy*) zones that can be developed in the most cost effective and environmentally benign manner,” but all commenters have serious misgivings about the treatment of environmental issues in the report.

Overwhelmingly, the comments point to two significant failures associated with the report: one is procedural, the other substantive. The first is that the timeframe for review and comment on the report (less than 8 business days) was completely unreasonable, and did not allow for a close reading of the 255 page document, let alone for the preparation of thorough, maximally useful comments. Further, as several commenters pointed out, that timeframe flies in the face of the statement on the RETI homepage that RETI will be “an open and transparent collaborative process in which all interested parties are encouraged to participate.” Nearly every comment that we received pointed out that restricting participant feedback by providing such a short review period effectively stifles the public participation goal of this process.

The second failure is the treatment of environmental factors in the draft report. As all the comments we received pointed out, the report contains extensive discussion about economics, and specifically its economic assumptions and methodology, but pays very little attention to environmental data or concerns. The fact that the report makes only passing mention of how environmental criteria might be incorporated, and the late establishment of an environmental working group were pointed to in comments as evidence of how environmental concerns are taking a back-seat to economic factors in the process. Further, the Center for Biological Diversity and several others point out that the NREL list of exclusion zones is neither detailed nor comprehensive enough for RETI’s purposes and the report’s simple description of it (see pg 6-32 (“in protected federal lands (wilderness, parks, monuments, etc.”)) seems to imply that environmental criteria are not important. Comments from the environmental participants overwhelmingly state that the environment cannot be an “add-on” and that environmental and economic factors must be fully integrated in the analysis. They emphasize that RETI cannot come to an outcome that will be broadly supported without significantly increasing the detail and scope of attention to environmental issues, including the screening criteria, in this report and throughout the process.

Below, as requested, we summarize a number of major specific concerns and recommendations that were raised most often in comments, including our own, and/or seemed to us to be most relevant to Black and Veatch’s charge for this report. Rather than rely entirely on this summary, however, we urge that each comment be carefully read and that the draft phase 1A report be revised significantly to reflect the serious concerns that have been raised.

## Specific Environmental Considerations:

### A. Environmental Screening Criteria

Many comments urge that more complete environmental screening criteria be used to determine available renewable resources as well as appropriate sites for generation and transmission. These criteria must be developed and applied before the “valuation” of renewable projects in phase 1b. Several groups point out that publicly-available GIS data compiled by the Center for Biological Diversity (CBD) should play a role in informing the environmental screening of resources, as should the list of protected and sensitive lands developed by NRDC and the Sierra Club that CBD used in its GIS work. Several groups also agree that the environmental working group, whose task it is to identify these screens, should include experts in environmentally sensitive lands, including for example at least one expert on land impacts in the desert from the U.S. Geological Survey.

Specific recommendations made by participants regarding screening criteria include the following:

- Updated archeological information must be used to identify areas of “known and suspected high cultural sensitivity.” A cultural areas survey commissioned by the Mojave Desert Land Trust was recently completed and should be available soon for use in screening lands.
- Many significant conservation areas are not included in the NREL criteria or screens and should be included in the criteria used by RETI. As indicated above, NRDC and Sierra Club have developed a detailed list that identifies these areas and many commenters urged that this list be employed in the RETI process.
- CBD and Defenders of Wildlife also included detailed lists that should be used to inform the selection of screening criteria. All comments that addressed this topic clearly expected that the final list of exclusion areas would include more areas than are on the NREL list and more areas than are currently protected from renewable energy development or transmission by federal law or policy.
- The Mojave Desert Land Trust points out that the military is currently engaged in adjusting the boundaries of their properties as well as acquiring buffer lands and this information should be included in the land screen.
- A more comprehensive look at water resources in the desert areas is required; specifically, areas where water table impacts from increased withdrawal may be significant must be identified.
- Criteria for use in identifying areas that are appropriate for projects and transmission lines should also be developed and should include such factors as already disturbed lands and former military base lands.

### B. Technologies – Impacts and Assumptions

Several environmental commenters point out that the impacts of various renewable technologies in Section 5, “technology assumptions,” are not fully described nor quantified. Specifically, they recommend comparing quantifiable impacts for each technology including:

- Land use (acres/MW of disturbed land from exploration, construction, siting, new roads, and permanently altered habitat);
- Water use (gallons, or acre-ft/MW);
- Where possible, quantify the impacts to species, such as bird and bat populations, or endangered species;

- Air pollutants that might be emitted by each technology should be identified and quantified;
- A more comprehensive look at the environmental impacts of small hydro projects is necessary;
- Neither economic nor social impacts to rural communities are currently addressed in the discussion of technologies or the identification of CREZs. These impacts to local communities should be identified in the analysis and quantified to the extent possible.

Specific comments regarding technology assumptions include the following:

- Several participants point to the recent announcement by SCE regarding its plan to build out 250 MW of distributed solar at an installed cost of \$3,500/kW over the next 5 years. Black and Veatch should provide information or analysis regarding the potential of more such projects to contribute to the California RPS, and thus potentially change the amount of remote renewables that will be required. In addition, Black and Veatch should, at a minimum, further clarify why they used the assumption that only one-half of the CSI program will count towards the RPS.
- Defenders of Wildlife includes a detailed list of environmental impacts of wind development that reflects work done in connection with the BLM Wind PEIS. As RETI and Black and Veatch move into identifying projects within potential CREZs, the guidelines for development in the Wind PEIS should be followed.
- Several comments identify small hydro as a technology that involves significant environmental controversy and impacts and urge that it be eliminated from the consideration of RETI.

#### **Phase 1B scope of work:**

Environmental comments overwhelmingly point to a failure to mention environmental criteria in the process of ranking CREZs. Comments emphasize that environmental criteria must be given equal consideration to economic criteria in identifying and ranking resource areas. Yet the draft report fails to do this at this time. While the process by which CREZs will be compared has yet to be determined, it should be clear from reading the report that more than just economic factors will play an integral role in determining the prioritization of CREZs. The next version must make it clear that environmental considerations will be an integral part of the ranking process and should include language that describes the roles of the Environmental Working Group, and the Stakeholder Steering Committee, in determining how the final ranking of CREZs will occur. Environmental participants emphasize that in order “to identify those (renewable energy) zones that can be developed in the most cost effective and environmentally benign manner” – RETI’s overarching goal, environmental considerations, including environmental criteria for evaluation of CREZs, must be given equal treatment with economic and other factors.

#### **Comments compiled from:**

Alliance for Responsible Energy Policy, Mojave Desert Land Trust, Wildlands Conservancy, The Wilderness Society, National Parks Conservation Association, Friends of Panamint, Desert Conservation Institute, Center for Biological Diversity, Defenders of Wildlife, Sierra Club: Mojave Group, Center for Community Action and Environmental Justice, NRDC, Sierra Club: CA, NV, HI regional office, and individuals: Sid Silliman, Ron Fein, Paul Smith, Joan Taylor